

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

PLAINTIFF CV1,

Plaintiff,

v.

**ROCKY SHAY FRANKLIN, an
individual; MINDGEEK S.A.R.L., a
foreign entity; MG FREESITES, LTD,
d/b/a “PORNHUB”, a foreign entity; MG
FREESITES II LTD, a foreign entity;
MINDGEEK USA, INCORPORATED, a
Delaware corporation; MINDGEEK
CONTENT RT LIMITED, a foreign entity;
9219-1568 QUEBEC INC. d/b/a
MINDGEEK, a foreign entity; MG
BILLING LTD, a foreign entity; MG CY
HOLDINGS LTD, a foreign entity,**

Defendants.

CIVIL ACTION NO.: 2:22-cv-00605

JURY TRIAL DEMANDED

**THE PARTIES’ RESPONSE TO THE COURT’S SHOW CAUSE ORDER
AND STATUS UPDATE REGARDING LITIGATION**

Plaintiff CV1 (“Plaintiff”), and Defendants MindGeek S.à.r.l., MG Freesites Ltd, MG Freesites II Ltd, MindGeek USA Incorporated, MG CY Holdings Ltd, MindGeek Content RT Limited, 9219-1568 Quebec Inc., and MG Billing Ltd (“Defendants,” and collectively with Plaintiff, the “Parties”), by and through the undersigned counsel, jointly submit this response to the Court’s Order (Doc. 68) concerning a status update in the above-referenced matter.

With respect to the required status update, the Parties continue to make progress in their settlement negotiations.

With respect to the Court's Order to Show Cause, the Parties acknowledge that the status report was not timely filed. Looking back, the Parties attribute the untimely filing to an honest miscommunication between the Parties coupled with the deadline falling on a holiday weekend (Labor Day). The Parties could provide more detail, but they instead apologize to the Court for this untimely filing and represent that they will ensure future reports are compliant with the Court's Orders and filed in a timely manner.

DATED: September 12, 2024

RESPECTFULLY SUBMITTED,

/s/ J. Parker Miller

J. Parker Miller

BEASLEY, ALLEN, CROW,
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**Attorney for Defendants MindGeek
S.à.r.l., MG Freesites Ltd, MG
Freesites II Ltd, MindGeek USA
Incorporated, MG CY Holdings Ltd,
MindGeek Content RT Limited,
9219-1568 Quebec Inc., and MG
Billing Ltd**

CERTIFICATE OF SERVICE

I certify that on this day, September 12, 2024, a copy of the foregoing was served on all counsel of record via CM/ECF and/or electronic mail.

Rocky Shay Franklin
FCI
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Marianna, FL 32446

/s/ J. Parker Miller
J. Parker Miller